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*ATTORNEYS FOR DEFENDANT BAYERISCHE MOTOREN WERKE
AKTIENGESELLSCHAFT*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JOSHUA HU, et al., individually and
on behalf of all others similarly
situated,

Plaintiffs,

v.

BMW OF NORTH AMERICA, LLC,
a Delaware corporation; and
BAYERISCHE MOTOREN WERKE
AKTIENGESELLSCHAFT (BMW
AG), a corporation organized under the
laws of Germany, ROBERT BOSCH
GMBH, a corporation organized under
the laws of Germany; and ROBERT
BOSCH LLC, a Delaware Limited
Liability Company,

Defendants.

Civil Action No. 2:18-cv-04363
(KM) (JBC)

Oral Argument Requested

MOTION DAY: March 1, 2021

Filed Electronically

**NOTICE OF DEFENDANT BAYERISCHE MOTOREN WERKE
AKTIENGESELLSCHAFT'S MOTION TO DISMISS PLAINTIFFS' FIRST
AMENDED CONSOLIDATED CLASS ACTION COMPLAINT FOR LACK
OF PERSONAL JURISDICTION**
(Oral Argument Requested)

PLEASE TAKE NOTICE that on March 1, 2021, at 10:00 a.m., or as soon thereafter as counsel may be heard, the undersigned attorneys for Defendant Bayerische Motoren Werke Aktiengesellschaft (“BMW AG”) shall move before the Honorable Kevin McNulty, U.S.D.J., at the United States District Court for the District of New Jersey, Martin Luther King, Jr. Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey, for the entry of an order pursuant to Federal Rule of Civil Procedure 12(b)(2) dismissing with prejudice the First Amended Consolidated Class Action Complaint in the above-captioned action and for such other relief as the court deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Stipulation and Order entered by this Court on November 13, 2020, Plaintiffs’ opposition to BMW AG’s Motion to Dismiss is due on or before January 15, 2021, and BMW AG’s reply in further support of its Motion to Dismiss is due on or before February 15, 2021.

PLEASE TAKE FURTHER NOTICE that, in support of this motion, BMW AG will rely upon the Memorandum of Law, the Declaration of Ronny Löwa, and the Declaration of Trudy Hardy, as well as any submissions offered on reply.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is also submitted herewith.

Dated: December 16, 2020

Respectfully submitted,

LATHAM & WATKINS LLP

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